

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JGIAP RH 160 LLC,

Plaintiff,

-against-

CRI HOLDING CORP., TOURAJ
NAGHIEH, MORALI AND ASSOCIATES,
ANTHONY MORALI, JOSEPH MORALI,
MANDA INTERNATIONAL
CORPORATION, STRIKEFORCE
MECHANICAL CORPORATION, AND
ANGELO CORRAO,

Defendants.

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Case No.: 1:21-cv-2849 (DG) (JRC)

**DECLARATION OF EMANUEL
KATAEV, ESQ. IN SUPPORT OF
DEFENDANTS'**

**MANDA INTERNATIONAL
CORP., STRIKEFORCE
MECHANICAL CORP., AND
ANGELO CORRAO'S
MOTION TO DISMISS**

EMANUEL KATAEV, ESQ., declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am an associate of Milman Labuda Law Group PLLC, counsel for Defendants Manda International Corp., (hereinafter "Manda") Strikeforce Mechanical Corp., 9hereinafter "Strikeforce") and Angelo Corrao (hereinafter "Corrao") (hereinafter Manda, Strikeforce, and Corrao collectively "Defendants") in the above-entitled action. As such, I am familiar with all of the facts and circumstances heretofore had herein.

2. I make this affirmation in support of Defendants' motion pursuant to pursuant to Rules 12(b)(1), 12(b)(6), and 9(b) of the Federal Rules of Civil Procedure to dismiss the Complaint of Plaintiff JGIAP RH 160 LLC (hereinafter "Plaintiff) as against the Defendants.

3. Annexed hereto as **Exhibit "A"** is a true and correct copy of the Complaint filed by Plaintiff, Docket Entry 1, in the above-entitled case.

4. Annexed hereto as **Exhibit “B”** is a true and correct copy of the New York State Department of Corporations entity information for Plaintiff, a publicly available document.

5. Annexed hereto as **Exhibit “C”** is a true and correct copy of the AIA contract between Plaintiff and Manda, referenced extensively in the complaint.

6. Annexed hereto as **Exhibit “D”** is a true and correct copy of the in the Petition filed in *Matter of Application of Red Hook 160 LLC v. Manda International Corp. et al.*; Index No. 513748/2021 (Sup. Ct., Kings Cty.), a publicly available document.

7. Annexed hereto as **Exhibit “E”** is a true and correct copy of the New York State Department of Corporations entity information for Red Hook 160 LLC, a publicly available document.

8. Annexed hereto as **Exhibit “F”** is a true and correct copy of the transcript from the September 3, 2021 pre-motion conference held before this Court.

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 11, 2022.

Dated: Lake Success, New York
April 11, 2022

/s
EMANUEL KATAEV, ESQ.